REMARKS

I. Introduction

With the addition of new claims 16 to 21, claims 1 to 21 are currently pending in the present application. In view of the foregoing amendments and the following remarks, it is respectfully submitted that all of the presently pending claims are allowable, and reconsideration is respectfully requested.

II. Rejection of Claims 1 to 4 Under 35 U.S.C. § 101

Claims 1 to 4 were rejected under 35 U.S.C. § 101 as assertedly being directed to non-statutory subject matter.

Claim 1 has been amended herein without prejudice to provide for a first memory unit, a second memory unit, and a processor, thereby rendering moot the present rejection. Withdrawal of this rejection is therefore requested.

III. Rejection of Claims 1 to 15 Under 35 U.S.C. § 102(e)

Claims to 1 to 15 were rejected under 35 U.S.C. § 102(e) as anticipated by U.S. Patent No. 6,922,685 ("Greene et al."). The present rejection should be withdrawn for at least the following reasons.

To reject a claim under 35 U.S.C. § 102(e), the Office must demonstrate that each and every claim feature is identically described or contained in a single prior art reference. (*See Scripps Clinic & Research Foundation v. Genentech, Inc.*, 18 U.S.P.Q.2d 1001, 1010 (Fed. Cir. 1991)). As explained herein, the Office Action does not meet this standard as to all of the features of the claims.

Independent Claims 1 and 9 and their Dependent Claims are Allowable over the Art

Claim 1 relates to a computer system for selectively retrieving runtime objects in an application development environment. Claim 1, as herein amended without prejudice, provides for:

> . . . a second memory unit storing a plurality of local runtime objects, each local runtime object including a generation setting associated with generation of the respective local runtime object . . .

Claim 9 relates to a computer-implemented method for selectively retrieving runtime objects in an application development environment. Claim 9 provides for:

> . . . storing a plurality of local runtime objects, each local runtime object including a generation setting associated with generation of the respective local runtime object . . .

The Office Action refers to column 61, lines 62 to 66 and column 62, lines 21 to 30 of Greene et al. as allegedly disclosing these features of claims 1 and 9. The referenced sections discuss copies of shared data objects and entity instance objects used for accessing the shared data objects, but Greene et al. do not disclose, or even suggest, that any of these objects includes a generation setting of any kind, and certainly not one that is associated with the object's generation.

Therefore, Greene et al. do not disclose, or even suggest, all of the features recited in either of claims 1 and 9, and do not anticipate either of claims 1 and 9, or any of their dependent claims, e.g., claims 2 to 4, and 10 to 12, respectively.

Dependent Claims 2 and 10 Recite Other Features that Distinguish Over the Art

Further, with respect to claims 2 and 10, which recite that a local runtime object is invalidated when its generation setting does not match a current generation setting, or that a processor is configured to do so, the Office Action refers to column 59, line 58 to column 60, line 19 as allegedly disclosing these features of claims 2 and 10. The referenced section discusses stale references to services, where a reference is used for accessing a service, but the referenced service no longer exists. When it is determined that the referenced service no longer exists, the reference is removed and another service is sought. This section does not disclose, or even suggest, an object that includes a generation setting and that is invalidated when it is determined that its generation setting does not match a current generation setting. Indeed, Greene et al. do not disclose, or even suggest, these features.

For this additional reason, Greene et al. do not anticipate either of dependent claims 2 and 10.

Independent Claim 5 is Allowable over the Art

Claim 5 relates to a computer system for selectively retrieving runtime objects in an application development environment. Claim 5, as amended herein without prejudice, provides for:

> . . . the generator component configured to invalidate and validate server and local runtime objects, and to regenerate the requested runtime object conditional upon the retrieved runtime object's validity . . .

The sections referred to by the Office Action as allegedly disclosing the features of claim 5 do not disclose, or even suggest, a generator component that validates, invalidates, retrieves, and regenerates a requested one of server and local runtime objects. Indeed, Greene et al. do not disclose, or even suggest, these features.

Therefore, Greene et al. do not disclose, or even suggest, all of the features recited in claim 5, and do not anticipate claim 5.

Independent Claims 6 and 13 are Allowable over the Art

Each of claim 6 and 13 recites "at least one local runtime object from the plurality of local runtime objects including, content, a state . . ." stored in a database or the step of storing it. The Office Action asserts that column 61, lines 62 to 66 and column 62, lines 21 to 30 of Greene et al. discloses the recited local runtime objects. As set forth above in support of the patentability of claim 1, the referenced sections discuss copies of shared data objects and entity instance objects used for accessing the shared data objects. Greene et al. do not disclose, or even suggest, that any of these objects includes a setting or a state of any kind other than its content, and therefore do not disclose, or even suggest, all of the features recited in either of claims 6 and 13.

Furthermore, it is "well settled that the burden of establishing a *prima facie* case of anticipation resides with the [United States] Patent and Trademark Office." *Ex parte Skinner*, 2 U.S.P.Q.2d 1788, 1788 to 1789 (Bd. Pat. App. & Inter. 1986). The Examiner has not satisfied this burden with respect to claims 6 and 13 because, while the Examiner has (incorrectly) addressed the features of claim 1, the Examiner has not at all addressed the features recited in either of claims 6 and 13, and has instead referred to the reasons for the rejection of claim 1. For example, none of the sections referenced by the Office Action with respect to the rejection of

claim 1 discusses pointers with a checksum attribute that point to runtime objects, comparison of the checksum value of the pointer to a newly generated checksum value of a requested runtime object, or invalidating the runtime object pointed to by the pointer based on the comparison. Applicants have found no such disclosure in Greene et al.

Indeed, Greene et al. do not disclose, or even suggest, all of the features recited in either of claims 6 and 13, and do not anticipate either of claims 6 and 13.

Independent Claims 7 and 14 and their Dependent Claims are Allowable over the Art

Claim 7 relates to a computer system for selectively retrieving runtime objects in an application development environment. Claim 7, as herein amended without prejudice, provides for:

> . . . a generator component responsive to a request for a requested runtime object by being configured to: determine if the plurality of server runtime objects includes a valid copy of the requested runtime object; if it is determined that the plurality of server runtime objects includes the copy of the requested runtime object, determine if the plurality of local runtime objects includes a runtime object that corresponds to the valid copy of the requested runtime object . . .

Claim 14 relates to a computer-implemented method for selectively retrieving runtime objects in an application development environment. Claim 14 provides for:

> . . . responding to a request for a requested runtime object by: determining if the plurality of server runtime objects includes a valid copy of the requested runtime object; if it is determined that the plurality of server runtime objects includes the copy of the requested runtime object, determining if the plurality of local runtime objects includes a runtime object that corresponds to the valid copy of the requested runtime object . . .

Greene et al. do not disclose, or even suggest, responding to a request for a runtime object, or a processor configured to respond to a request for a runtime object, by determining if the requested object is in a plurality of server objects, and if so determining if a local object corresponds to the server object.

Therefore, Greene et al. do not disclose, or even suggest, all of the features recited in either of claims 6 and 14, and do not anticipate either of claims 7 and 14, or their dependent claims 8 and 15, respectively.

Dependent Claims 8 and 15 Recite Other Features that Distinguish Over the Art

Further, with respect to claims 8 and 15, which recite that a local runtime object corresponds to a server runtime object when the local runtime object's content attributes and state attributes match the server runtime object's content attributes and state attributes, the Office Action refers to column 32, lines 16 to 39 as allegedly disclosing the features recited in claims 8 and 15. The referenced section discusses a registry that broadcasts its availability. How the Examiner gleans from the referenced section anything that remotely hints at the features recited in claims 8 and 15, let alone discloses it, is incomprehensible. Indeed, Greene et al. do not disclose, or even suggest, the features recited in either of claims 8 and 15.

For this additional reason, Greene et al. do not anticipate either of dependent claims 8 and 15.

In view of all of the foregoing, withdrawal of this rejection is respectfully requested.

IV. New Claims 16 to 21

New claims 16 to 21 have been added herein. It is respectfully submitted that new claims 16 to 21 do not add any new matter and are fully supported by the present application, including the Specification.

Claim 16 relates to a computer system for selectively retrieving runtime objects in an application development environment and includes subject matter similar to that of claim 1. Therefore claim 16 and its dependent claims, *i.e.*, claims 17 to 20, are patentable over Greene et al. for at least the same reasons set forth above in support of the patentability of claim 1.

Claim 21 depends from claim 5 and is therefore patentable over Greene et al. for at least the same reasons set forth above in support of the patentability of claim 5.

V. Conclusion

In light of the foregoing, it is respectfully submitted that all of the presently pending claims are in condition for allowance. Prompt reconsideration and allowance of the present application are therefore earnestly solicited.

Respectfully submitted,

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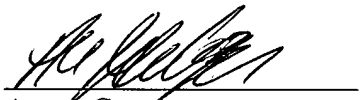

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